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December 23, 2011

Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Re: Leaders for Families Super PAC, Inc.

VIA FAX AND COURIER

Dear Sir or Madam:

Please be advised that this firm represents the Leaders for Families Super PAC, Inc. ("Committee"). This letter explains the best efforts made by the Committee to comply with the 24-hour reports required when making independent expenditures exceeding \$1,000 within 20 days of an election.

Leaders for Families Super PAC, Inc. was formed on December 21, 2011. On December 22, 2011, the Committee disseminated an autodial call featuring express advocacy of a federal candidate costing \$5,447.25. On December 23, 2011, the Committee also placed a buy for a radio ad to be broadcast starting December 27, 2011, featuring express advocacy of a federal candidate, which will cost \$8,945.00. These communications were and will be publicized in Iowa and refer to the presidential caucus there, which takes place on January 3, 2011. Therefore, the group triggered political committee status on December 22, 2011, 11 CFR § 100.5(a) and has ten days to file its statement of organization (Form 1) with the Commission. Form 1 must be paper filed with an original signature and so the Committee has not yet filed it. But these same communications trigger 24-hour independent expenditure reports by a political committee, 11 CFR § 104.4(f), which must be filed on Schedule E of Form 3X. Because of the amount of the expenditures, however, the Committee is required to electronically file under 11 CFR § 104.18(a)(3)(B)(ii). Yet, because the Committee has not filed, and is not yet required to file its Form 1, it does not have and cannot obtain an FEC ID number and electronic filing password within 24 hours. Therefore, although it is technically an "electronic filer," it is impossible for the

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